REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejection of the application are respectfully requested in view of the remarks herewith.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-9, 11-35, 37-41, and 43-50 are currently pending. No claims are amended.

II.   REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-9, 11-35, 37-41, and 43-50 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,144,969 to Inokuchi et al. (hereinafter, merely "Inokuchi") in view of U.S. Patent No. 5,440,401 to Parulski et al. (hereinafter, merely "Parulski") and further in view of U.S. Patent No. 6,282,549 to Hoffert et al. (hereinafter, merely "Hoffert").

III.   RESPONSE TO REJECTIONS

Firstly, independently Claim 1 recites, *inter alia*:

"wherein each of the respective files corresponding to a
predetermined attribute selected from the plurality of attributes,
and each of the plurality of respective files **stores starting bytes
and data lengths of entries corresponding to the predetermined
attribute**." (emphasis added)

The Office Action (see page 5 of the Office Action) concedes that Inokuchi and Parulski fail to teach the above-identified features of claim 1 and relies on col. 6, lines 58-67, col. 7, line 55-col. 8, line 4, and col. 24, lines 5-13 of Hoffert to reject "wherein each of the

respective files corresponding to a predetermined attribute selected from the plurality of

attributes, and each of the plurality of respective files **stores starting bytes and data lengths of**

entries corresponding to the predetermined attribute," as required by claim 1. Applicants

respectfully disagree.

Hoffert relates to a method that searches online media files, indexing searched

media files, and displaying the indexed media files in a form of icons to a user. Hoffert indeed

describes information included in a media index at col. 7, lines 25-60, which is reproduced as

follows:

ITEM	WEIGHTING FACTOR	
URL of the media file	10	30
Keywords embedded in the media file	10	
Textual annotations in the media file	10	
script dialogue, lyrics, and closed captioning in the media file	10	
Text strings associated with the media file anchor reference	9	
Text surrounding the media file reference	7	35
Title of the HTML document containing the media file	6	
Keywords and meta-tags associated with the HTML document	6	
URL for the HTML document containing the media file reference	5	40

    In other embodiments, alternative weighting factors may be utilized without departure from the present invention.
Store Data for each Media Object
    Finally, data is stored for each media object. In the   45
described embodiment, the following data is stored:
    Relevant text
    HTML document title
    HTML meta tags
    Media specific text (e.g., closed captioning, annotations,   50
      etc.)
    Media URL
    Anchor text
    Content previews (discussed below)   55
    Content attributes (such as brightness, color or B/W,
      contrast, speech v. music and volume level. In addition,
      sampling rate, frame rate, number of tracks, data rate,
      size may be stored).
    Of course, in alternative embodiments a subset or superset   60
of these fields may be used.

Applicants respectfully submit that nothing in the cited portion of Hoffert or other

part of Hoffert discloses or renders predictable "wherein each of the respective files

corresponding to a predetermined attribute selected from the plurality of attributes, and each of

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the plurality of respective files **stores starting bytes and data lengths of entries** corresponding

to the predetermined attribute," as required in claim 1.

Secondly, independent Claim 1 recites, *inter alia*:

"…**classification means for classifying the block of extracted
information included in each entry according to the plurality
of attributes,**

**wherein the plurality attributes include a property attribute, a
text attribute, a thumbnail attribute, and an audio attribute.**"
(emphasis added)

The Office Action (see page 4 of the Office Action) concedes that Inokuchi fails

to disclose or suggest the above-identified features of claim 1 and relies on Column 5, lines 50-

56 of Parulski to reject "**classification means for classifying the block of extracted**

information included in each entry according to the plurality of attributes," as recited in

claim 1. The cited portion of Parulski describes:

> When the montage button 210 (FIG. 1) is pressed by the user, the CD reader
> moves to the index file data track and reads some of the data from the index
> image records into memory. Depending on the number of stored images
> indicated by the index file 31 (FIG. 2), either a single montage, or a plurality of
> montage images, may be stored into memory 50. In order to produce a montage
> of up to four images, as diagrammatically illustrated in FIG. 7, the four 256×384
> low resolution records are read into memory 50 in such a manner that the first
> image 401 is placed in the upper left corner, the second image 402 is placed in
> the upper right corner, the third image 403 is placed in the lower left corner and
> the fourth image 404 is placed in the lower right corner. Text generator 62
> overlays the numbers of the four images in the appropriate locations. Because
> the data for these four images is all stored together in index image file 31 shown
> in FIG. 2, the montage is created much faster than if the low resolution image
> information had to be retrieved from the four high resolution files 32-1, 32-2,
> 32-3 and 32-4, since the time required by the CD reader to access these four files
> is four times as long as the time required to access the single index image file.

Specifically, the Office Action (see page 29 of the Office Action) states that "in

order to display in the full screen, the block of retrieved images are being classified as first

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index [image], second index [image] etc." The Office Action actually treats each image as an

attribute in order to reject the above-identified features of claim 1. Applicants respectfully point

out that the Office Action incorrectly interprets each index image of Parulski as an attribute of

that index image. Applicants submit that it is illogical for a person of ordinary skill in the art to

treat an image as an attribute of that image. Applicants submit that the Office Action's

interpretation is based on speculation. Furthermore, Applicants submit that claim 1 requires that

"the plurality attributes include a property attribute, a text attribute, a thumbnail

attribute, and an audio attribute."

Therefore, Applicants submit that independent claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1,

independent claims 5, 7, 9, 11, 32-35, 36-41, 43, and 47 are also patentable.

Furthermore, dependent Claim 50 recites, *inter alia*:

wherein the index file has an organization substantially the
same as that of a QuickTime Movie file. (emphasis added)

The Office Action (see page 21) concedes that Inokuchi and Parulski fail to

disclose or render predictable the above-identified features of claim 50 and relies on paragraph

Figs. 2a-2c of Hoffert to reject **"wherein the index file has an organization substantially the**

same as that of a QuickTime Movie file," as recited in claim 50. Applicants respectfully

disagree.

Applicants submit that Hoffert in Fig. 2a-2c describe how to index searched

media files. Hoffert indeed describes contents to be included in the media rich index. However,

Hoffert is silent on the organization of the media rich index. Therefore, Hoffert fails to

disclose or render predictable that "**the index file has an organization substantially the same**

as that of a QuickTime Movie file," as recited in claim 50.

Therefore, Applicants submit that claim 50 is patentable over Inokuchi, Parulski,

and Hoffert.

IV.   DEPENDENT CLAIMS

The other claims are dependent from one of the independent claims, discussed

above, and are therefore believed patentable for at least the same reasons. Since each dependent

claim is also deemed to define an additional aspect of the invention, however, the individual

reconsideration of the patentability of each on its own merits is respectfully requested.

Similarly, because Applicants maintain that all claims are allowable for at least

the reasons presented hereinabove, in the interests of brevity, this response does not comment on

each and every comment made by the Examiner in the Office Action. This should not be taken

as acquiescence of the substance of those comments, and Applicants reserve the right to address
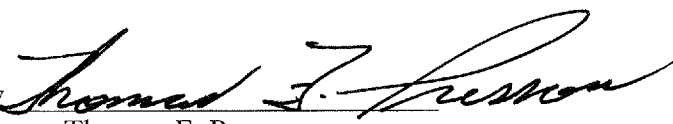
such comments.

<u>CONCLUSION</u>

In the event the Examiner disagrees with any of statements appearing above with

respect to the disclosure in the cited reference or references, it is respectfully requested that the

Examiner specifically indicate those portions of the reference or references providing the basis

for a contrary view.

Please charge any additional fees that may be needed, and credit any

overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that claim 4 is

patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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